REMARKS

Claims 1-26 are all the claims presently pending in the application. Claims 1-26 and the Abstract have been amended to more clearly define the invention. Claims 1, 8, 14, 19 and 24 are independent.

These amendments are made only to more particularly point out the invention for the Examiner and not for narrowing the scope of the claims or for any reason related to a statutory requirement for patentability.

Applicant also notes that, notwithstanding any claim amendments herein or later during prosecution, Applicant's intent is to encompass equivalents of all claim elements.

Claims 19 and 21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Rasanen (U.S. Patent No. 6,445,924). Claims 1-5 and 8-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhatia (U.S. Patent No. 5,930,699) in view of Rasanen and further in view of Kusaki et al. (U.S. Patent No. 5,749,053 and Hussain et al. (U.S. Patent No. 6,173,180). Claims 6 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhatia in view of Rasanen and further in view of Kusaki et al. and Hussain et al. and Gentry (U.S. Patent No. 6,453,162). Claims 7 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhatia in view of Rasanen and further in view of Kusaki et al. and Hussain et al. and Valentine et al. (U.S. Patent No. 6,449,478). Claim 20 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Rasanen in view of Hussain. Claim 22 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Rasanen in view of Gentry. Claim 23 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Rasanen.

These rejections are respectfully traversed in the following discussion.

I. THE CLAIMED INVENTION

A first exemplary non-limiting, embodiment of the claimed invention as defined, for example by claim 1, is directed to a mobile wireless communication system which includes an information server, a portable terminal, a plurality of wireless communication servers, a switch, and a wireless telephony server. The portable terminal communicates with the information server through a wireless communication line and has a buffer memory which stores information transmitted from the information server. A first of the plurality of wireless communication gateway servers is selected based upon the position of the portable terminal, has a buffer emulator which stores data regarding the buffer memory in the portable terminal, and transmits information from the information server to the portable terminal based upon the data in the buffer emulator. The switch sets the connection between the portable terminal and the first wireless communication gateway server and also sets a connection between the portable terminal and a second of the plurality of wireless communication gateway servers when the first wireless communication gateway server is congested. The wireless telephony server of the first exemplary embodiment informs the plurality of wireless communication gateway servers of the position of the portable terminal.

A second exemplary, non-limiting embodiment of the present invention, as defined, for example by claim 14, is directed to a method for operating a mobile wireless communication system. The method includes storing data representing a specification of a buffer memory of a portable terminal in a buffer memory emulator of a first wireless communication gateway server when the portable terminal is connected to the first wireless communication gateway server, changing from one connection between the portable terminal and the first wireless communication gateway server to another connection between the

portable terminal and a second wireless communication gateway server when the first wireless communication gateway server is congested, and transferring the specification data from the first wireless communication gateway server to the second wireless communication gateway server.

A third exemplary, non-limiting embodiment of the present invention, as defined, for example by claim 19, is directed to method for operating a mobile wireless communication system including changing from one connection between a portable terminal and one access point of a wireless communication gateway server to another connection between the portable terminal and another access point of the wireless communication gateway server when the wireless communication gateway server is congested. The wireless communication gateway server converts a protocol between the portable terminal and an information server on a network.

As shown in Fig. 1, conventional systems have included a portable terminal 20 which accesses an information server 26 through a wireless communication gateway server 24A via a wireless link to an access point APa.. The wireless communication gateway server 24A converts the protocols between the portable terminal 20 and the information server 26 (page 2, line 5 - page 3, line 6).

The wireless communication gateway server 24A also includes a buffer memory emulator 25 which stores information from the information server 26 being transmitted to the buffer memory 21 of the portable terminal 20 and also stores specification data regarding the buffer memory 21 (page 3, lines 7-23).

These conventional systems also register the position of the portable terminal 20 in a position information database 23. A switch 22 may then establish communication lines with

the portable terminal 20 based upon the registered position (page, lines 2-22).

The portable terminal 20 obtains information from the information server 26 by placing a call to a telephone number of the access point APa which has been stored in the portable terminal 20 to establish a connection between the portable terminal 20 and the wireless communication gateway server 24A having the access point Apa (page 4, line 23 - page 5, line 7). However, with these conventional systems, the portable terminal 20 is required to call a registered telephone number of only one access point APa which has been assigned to the portable terminal 20. Therefore, if the access point APa is congested, the portable terminal 20 is unable connect to the wireless communication gateway server 24A at access point APa (page 5, lines 15-25).

Thus, these conventional systems have required the installation of a new access point into the portable terminal 20 in order to establish communication with the portable terminal 20 and the information server 26. Additionally, a user of the portable terminal 20 is required to wait until the process for monitoring the buffer memory is initialized. Therefore, a user of the portable telephone 20 has been required to wait until a new access point is installed, a connection to the new access point is established and the process for monitoring the buffer memory is initialized if the access point APa of the wireless communication gateway server 24A is congested (page 5, line 26 - page 6, line 11). This delay not only results in a waste of time but may also impose an economic burden on the user when a communication fee is charged based upon the amount of time that the portable terminal 20 stays connected to a base station (not shown).

The present invention may reduce the amount of time required for a portable terminal to access an information server.

In the first exemplary embodiment of the present invention, as shown in Fig. 2, the wireless telephony server 8 informs a plurality of wireless communication gateway servers 5A and 5B of the position of the portable terminal 1. In this manner, the servers 5A and 5B may take various actions to reduce the amount of time required for the portable terminal 1 to access an information server 7. For example, a wireless communication gateway server may request the switch 3 to change a connection with the portable terminal 1 based upon the position (page 8, lines 22-27).

In the second exemplary embodiment of the present invention, the wireless communication gateway servers may transfer the specification data from a first wireless communication gateway server to a second wireless communication gateway server to reduce the amount of time for the portable terminal 1 to communicate with the information server 7 should the portable terminal have a communication switched from the first wireless communication gateway server to the second wireless communication gateway server.

In the third exemplary embodiment of the present invention, if the wireless communication gateway server is congested, a connection at one access point of a wireless communication gateway server may be changed to another access point of the same wireless communication gateway apparatus. For example, the wireless communication gateway server may instruct the switching apparatus to carry out connection to another access point at the same wireless communication gateway server.

II THE PRIOR ART REJECTIONS

A. The Rasanen reference

Regarding the rejection of claims 19 and 21, the Examiner alleges that the Rasanen

reference teaches the claimed invention. Applicant submits, however, that there are elements of the claimed invention which are neither taught nor suggested by these references.

The applied reference does not teach or suggest the features of the present invention including changing from one connection between a portable terminal and one access point of a wireless communication gateway server to another connection between the portable terminal and another access point of the wireless communication gateway server. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Indeed, the Rasanen reference does not even teach or suggest a wireless communication gateway server, let alone changing between access points on a wireless communication gateway server. The wireless communication gateway server converts a protocol between the portable terminal and an information server on a network

Rather, the Rasanen reference discloses addressing the problems of implementing handoffs between base station cells when it is necessary to reduce the congestion of any base station cell (col. 3, line 56 - col. 4, line 10). The Examiner appears to confuse a base station (BTS) as shown in Fig. 1 of the Rasanen reference with the wireless communication gateway servers used by the present invention.

As explained by the present specification, the base station is used to establish radio communication into the system of the present invention. For example, the base station (i.e. radio antenna) has a known location and the position of the portable terminal may be reported by the base station to the switch for storage in the position information database (page 4, lines 2-13).

The Rasanen reference explains that a base station may become congested. However,

this congestion is very different from the type of congestion that may be experienced by a wireless communication gateway server. For example, the congestion experienced at a base station is a result of the radio frequency allocation at the base station. In stark contrast, as explained above, the wireless communication gateway server operates on a network and converts protocols between the portable device and the information server. The wireless communication gateway server may experience congestion as a result of the bandwidth at an access point not being sufficient to handle the amount of data transfers being requested through the access point.

Clearly, as explained by the present specification, a base station is not a wireless communication gateway server.

Therefore, contrary to the allegations of the Examiner the Rasanen reference does not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 19 and 21.

B. The Bhatia reference in view of the Rasanen reference in view of the Kusaki et al. reference and in view of the Hussain et al. reference

Regarding the rejection of claims 1-5 and 8-11, the Examiner alleges that the Rasanen reference would have been combined with the Bhatia reference, that the Kusaki et al. reference would have been combined with the combination of the Rasanen reference and the Bhatia reference, and that the Hussain et al. reference would have been combined with the combination of the Bhatia reference, the Rasanen reference and the Kusaki et al. reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each

and every element of the claimed invention.

Applicant submits that it is highly unlikely, absent impermissible hindsight, that one of ordinary skill in the art would have been motivated to combine four completely separate and independent references in order to arrive at the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

Specifically, the Bhatia reference is directed to addressing the needs of a subscriber traveling in an unfamiliar area who may need to locate a particular business or facility within the unfamiliar area and without requiring the use of a global positioning system (col. 1, lines 10-27). The Bhatia reference addresses this problem by providing a relational database which relates business classification categories 70 and address data 85 to a cell group identity 75 and location area 80 reported by the mobile station MS.

In contrast, as explained above, the Rasanen reference is specifically directed to handling congestion within a particular base station cell. Therefore, one of ordinary skill in the art would not have been motivated to modify the Bhatia reference which is directed to addressing the needs of a subscriber traveling in an unfamiliar area based upon the completely different problem of handling congestion within a base station cell as addressed by the Rasanen reference.

In contrast to the Bhatia reference and the Rasanen reference, the Kusaki et al. reference is directed to providing terminal information for each mobile station using either a home memory type mobile communication network which is limited by the size of a central database and a broadcast type mobile communication network which is limited by the amount

of processing and increase in traffic required to transfer terminal information between switching centers. Thus, one of ordinary skill in the art would not have been motivated to modify either of the Bhatia reference and the Rasanen reference, because the Kusaki et al. reference is concerned with providing terminal information to switching centers, while the Bhatia reference is directed to the completely different problem of addressing the needs of a subscriber traveling in an unfamiliar area, while the Rasanen reference is directed to the completely different problem of handling congestion within a base station cell.

Further, in stark contrast to the Bhatia reference, the Rasanen reference and the Kusaki et al. reference, the Hussain et al. reference is directed to providing a system and method for providing preferential access to subscribers of localized service areas (LSA) that efficiently use the resources of the network, is compatible with the Support of Localized Service Area (SoLSA) standard and overcomes the problems presented by other prioritization techniques in the Global System for Mobile Communication (GSM) system. Thus, one of ordinary skill in the art would not have been motivated to modify any of the Bhatia reference, the Rasanen reference and the Kusaki et al. reference because the Hussain et al. reference is concerned only with providing preferential access to subscribers of localized service areas, while the Kusaki et al. reference is directed to the completely different problem of providing terminal information to switching centers, while the Bhatia reference is directed to the completely different problem of addressing the needs of a subscriber traveling in an unfamiliar area, while the Rasanen reference is directed to the completely different problem of handling congestion within a base station cell.

Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion

in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

Even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention. None of the applied references teach or suggest a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Rather, in the same manner as described in the background and shown in Fig. 1 of the present specification the Bhatia reference discloses a base station (base station 36), a switching apparatus 22 (mobile switching center 30) and a position information database 23 (home location register 40). Indeed, the Examiner admits that the Bhatia reference does not teach or suggest a wireless telephony server.

Further, as explained above, contrary to the Examiner's allegations, the Rasanen reference does not teach or suggest a wireless communication gateway server. As explained by the present specification, a wireless communication gateway server converts a protocol between the portable terminal and an information server on a network

In contrast, the Rasanen reference discloses addressing the problems of implementing handoffs between base station cells when it is necessary to reduce the congestion of any base station cell (col. 3, line 56 - col. 4, line 10). The Examiner appears to confuse a base station (BTS) as shown in Fig. 1 of the Rasanen reference with the wireless communication gateway servers used by the present invention.

The Rasanen reference also does not remedy the deficiencies of the Bhatia reference.

The Rasanen reference does not teach or suggest wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal. Indeed, the Examiner does not contradict this statement.

The Kusaki et al. reference also does not teach or suggest a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal. Rather, the Kusaki et al. reference, in a manner similar to that described in the background and shown in Fig. 1 of the present specification, Fig. 1 of the Kusaki et al. reference discloses a base station (base station BS) and a switching apparatus 22 (switching center 130). Indeed, the Examiner does not contradict this statement.

Contrary to the Examiner's allegation, the Hussain et al. reference, like the Bhatia reference, the Rasanen reference and the Kusaki et al. reference, does not teach or suggest a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal. Rather, in the same manner as described in the background and shown in Fig. 1 of the present specification, Fig. 1 of the Hussain et al. reference discloses a base station (Cell -B and/or base station controller BSC), a switching apparatus 22 (mobile switching center 12) and a position information database 23 (home location register 13).

The Examiner cites col. 3, lines 55-61 of the Hussain et al. reference in an attempt to support the allegation that the Hussain et al. reference discloses a wireless telephony server. However, the Examiner's citation merely describes how a base station controller BSC 11 recognizes the cell Cell B from which a call is made and determines which, if any, localized service area (LSA) contains the cell. The base station controller BSC 11 also obtains the mobile station's subscription information from the home location register HLR 13. The

subscription information contains localized service area identification numbers for any localized service area to which the mobile station subscribes. Nowhere within the Examiner's citation is there a teaching or suggestion of a wireless telephony server.

Rather, as explained above, the Examiner appears to confuse a wireless telephone server with a base station, base station controller, switching apparatus and a position information database.

Clearly, the novel feature of a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal is not taught or suggested by the Hussain et al. reference. Indeed, the Hussain et al. reference is completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 1-5 and 8-11.

C. The Bhatia reference in view of the Rasanen reference in view of the Kusaki et al. reference in view of the Hussain et al. reference and in view of the Gentry reference

Regarding the rejection of claims 6 and 12, the Examiner alleges that the Rasanen reference would have been combined with the Bhatia reference, that the Kusaki et al. reference would have been combined with the combination of the Rasanen reference and the Bhatia reference, that the Hussain et al. reference would have been combined with the combination of the Bhatia reference, the Rasanen reference and the Kusaki et al. reference and that the Gentry reference would have been combined with the combination of the Bhatia reference, the Rasanen reference, the Kusaki et al. reference and the Hussain et al. reference

to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that one of ordinary skill in the art would not have been motivated to combine five (5!) completely separate and independent references in order to arrive at the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

As explained above, the Bhatia reference, the Rasanen reference, the Kusaki et al. reference and the Hussain et al. reference are all directed to completely different matters and problems. Therefore, one of ordinary skill in the art at the time of the invention would not have been motivated to combine these four references.

In stark contrast to the Bhatia reference, the Rasanen reference, the Kusaki et al. reference, and the Hussain et al. reference, the Gentry reference is directed to providing a method and system for provisioning (i.e. configuring the home location register to enable specified features) a home location register over the Internet. Thus, one of ordinary skill in the art would not have been motivated to modify any of the Bhatia reference, the Rasanen reference, the Kusaki et al. reference and the Hussain et al. reference because the Gentry reference is concerned only with enabling provisioning of a home location register via the Internet, while the Hussain et al. reference is directed to the completely different problem of providing preferential access to subscribers of localized service areas, while the Kusaki et al. reference is directed to the completely different problem of providing terminal information to

switching centers, while the Bhatia reference is directed to the completely different problem of addressing the needs of a subscriber traveling in an unfamiliar area, while the Rasanen reference is directed to the completely different problem of handling congestion within a base station cell.

Thus, the references would not have been combined, absent hindsight.

Even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention.

As explained above, none of the Bhatia reference, the Rasanen reference, the Kusaki et al. reference, and the Hussain et al. reference teach or suggest the feature of a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Moreover, the Gentry reference, like the Bhatia reference, the Rasanen reference, the Kusaki et al. reference, and the Hussain et al. reference, does not teach or suggest a wireless telephony server, let alone a a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal.

Rather, the Gentry reference discloses a personal computer 48 which may access a web server 44 via the Internet to request service features that the user would like to have activated. The web server 44 generates one or more home location register access messages which are transmitted via the Internet 46, the wireless data server 42 and the IS-41 Network 40 to the home location register 17 to activate the functions (col. 5, lines 43-67 and Fig. 2).

Indeed, the Gentry reference does not even teach or suggest a wireless communication

gateway server, let alone a wireless telephony server which informs a plurality of wireless communication gateway servers.

Clearly, these novel features are not taught or suggested by the Gentry reference. Indeed, the Gentry reference is completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 6 and 12.

D. The Bhatia reference in view of the Rasanen reference in view of the Kusaki et al. reference in view of the Hussain et al. reference and in view of the Valentine et al. reference

Regarding the rejection of claims 7 and 13, the Examiner alleges that the Rasanen reference would have been combined with the Bhatia reference, that the Kusaki et al. reference would have been combined with the combination of the Rasanen reference and the Bhatia reference, that the Hussain et al. reference would have been combined with the combination of the Bhatia reference, the Rasanen reference and the Kusaki et al. reference and that the Valentine et al. reference would have been combined with the combination of the Bhatia reference, the Rasanen reference, the Kusaki et al. reference and the Hussain et al. reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that it is highly unlikely that one of ordinary skill in the art would have been motivated to combine five completely separate and independent references in order to arrive at the claimed invention.

Applicant further submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

As explained above, the the Bhatia reference, the Rasanen reference, the Kusaki et al. reference and the Hussain et al. reference are all directed to completely different matters and problems. Therefore, one of ordinary skill in the art at the time of the invention would not have been motivated to combine these four references.

In stark contrast to the Bhatia reference, the Rasanen reference, the Kusaki et al. reference, and the Hussain et al. reference, the Valentine et al. reference is directed to addressing the problem of inaccurate satellite hop delay for determining how to route a call from a satellite which receives a communication directly from a satellite phone (col. 2, line 42 - col. 3, line 30) by providing a satellite hop counter which includes three fields, one for each type of delay (col. 3, lines 32-43). Thus, one of ordinary skill in the art would not have been motivated to modify any of the Bhatia reference, the Rasanen reference, the Kusaki et al. reference and the Hussain et al. reference because the Valentine et al. reference is concerned only with addressing the problem of inaccurate satellite hop delay for determining how to route a call from a satellite which receives a communication directly from a satellite phone, while the Hussain et al. reference is directed to the completely different problem of providing preferential access to subscribers of localized service areas, while the Kusaki et al. reference is directed to the completely different problem of providing terminal information to switching centers, while the Bhatia reference is directed to the completely different problem of addressing the needs of a subscriber traveling in an unfamiliar area, while the Rasanen reference is directed to the completely different problem of handling congestion within a base

station cell.

Indeed, none of the Bhatia reference, the Rasanen reference, the Kusaki et al. reference and the Hussain et al. reference have anything to do with a satellite based mobile phone system.

Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

Rather, the Examiner merely alleges that it would have been obvious to modify these four references based upon the teaching of the Valentine et al. reference "so that the satellite network can be used with the mobile wireless network. Applicant respectfully submits that the mere allegation that something can be used with something else does not provide any motivation for making such a modification.

Even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention.

As explained above, none of the Bhatia reference, the Rasanen reference, the Kusaki et al. reference, and the Hussain et al. reference teaches or suggests the feature of a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Moreover, the Valentine et al. reference, like the Bhatia reference, the Rasanen reference, the Kusaki et al. reference, and the Hussain et al. reference, does not teach or

suggest a wireless telephony server, let alone a a wireless telephony server that informs a plurality of wireless communication gateway servers of the position of the portable terminal.

Rather, in the same manner as described in the background and shown in Fig. 1 of the present specification, Figs. 1 and 2 of the Valentine et al. reference discloses a base station (base station system 25, base station controller 23 and satellite adapted base station system 220), a switching apparatus 22 (mobile switching center 14) and a position information database 23 (home location register 26).

Additionally, contrary to the Examiner's allegation, the Valentine et al. reference does not teach or suggest a satellite network connected to wireless communication gateway servers, a switching apparatus or a wireless telephony server. Rather, the Valentine et al. reference merely discloses a mobile station 20 and a base station system 220 connected to a satellite network.

Clearly, these novel features are not taught or suggested by the Valentine et al. reference. Indeed, the Valentine et al. reference is completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 7 and 13.

E. The Rasanen reference in view of the Hussain et al. reference

Regarding the rejection of claim 20, the Examiner alleges that the Hussain et al. reference would have been combined with the Rasanen reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of

the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

Specifically, as explained above, the Rasanen reference is directed to addressing the problems of implementing hand-offs between base station cells when it is necessary to reduce the congestion of any base station cell (col. 3, line 56 - col. 4, line 10).

In contrast, as explained above, the Hussain et al. reference is specifically directed to providing a system and method for providing preferential access to subscribers of localized service areas (LSA) that efficiently use the resources of the network, is compatible with the Support of Localized Service Area (SoLSA) standard and overcomes the problems presented by other prioritization techniques in the Global System for Mobile Communication (GSM) system. Therefore, one of ordinary skill in the art would not have been motivated to address the problem of implementing hand-offs between base station cells as disclosed by the Rasanen reference based upon the teachings of the Hussain et al. reference because the Hussain et al. reference is directed to the completely different and unrelated problems of providing preferential access to subscribers of localized service areas (LSA) that efficiently use the resources of the network, is compatible with the Support of Localized Service Area (SoLSA) standard and overcomes the problems presented by other prioritization techniques in the Global System for Mobile Communication (GSM) system.

Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner

does not even support the combination by identifying a reason for combining the references.

Rather, the Examiner alleges that it would have been obvious to modify the teachings of the Rasanen reference with the disclosure of the Hussain et al. reference "so that the system can update the current location of mobile (sic) unit." However, Applicant respectfully submits that the Hussain et al. does not teach anything at regarding any improvement to a system for updating the current location of a mobile unit. Indeed, the Hussain et al. reference does not teach or suggest anything at all about how to update the current location of the mobile unit.

Further, even assuming arguendo that the Hussain et al. reference did teach a system for updating the current location of a mobile unit, the Hussain et al. reference does not provide any suggestion or motivation as to why such a system would be an improvement to the system for updating the current location of the mobile unit which already exists within the system disclosed by the Rasanen reference.

In summary, there is no need to modify the system disclosed by the Rasanen reference to provide a system for updating the current location of a mobile unit, because the system disclosed by the Rasanen reference already has a system for updating the current location of a mobile unit.

Moreover, even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention.

The Hussain et al. reference, like the Rasanen reference, does not teach or suggest does not teach or suggest the features of the present invention including changing from one connection between a portable terminal and one access point of a wireless communication

gateway server to another connection between the portable terminal and another access point of the wireless communication gateway server. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Clearly, these novel features are not taught or suggested by the Hussain et al. reference. The Hussain et al. reference does not even disclose a wireless communication gateway server, let alone changing connections between access points on a wireless communication gateway server. Indeed, the Hussain et al. reference is completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claim 20.

F. The Rasanen reference in view of the Gentry reference

Regarding the rejection of claim 22, the Examiner alleges that the Gentry reference would have been combined with the Rasanen reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

Specifically, as explained above, the Rasanen reference is directed to addressing the problems of implementing hand-offs between base station cells when it is necessary to reduce

the congestion of any base station cell (col. 3, line 56 - col. 4, line 10).

In contrast, the Gentry reference is directed to providing a method and system for provisioning (i.e. configuring the home location register to enable specified features) a home location register over the Internet. Therefore, one of ordinary skill in the art at the time of the invention would not have been motivated to address the problems of implementing hand-offs between base station cells when it is necessary to reduce the congestion of any base station cell as discussed by the Rasanen reference based upon the disclosure of the Gentry reference which is directed to the completely different problem of provisioning a home location register. Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

The Examiner alleges that it would have been obvious to modify the Rasanen reference based upon the disclosure of the Gentry reference "so that user (sic) can access internet (sic) via mobile wireless network."

Contrary to the Examiner's allegation, the Gentry reference does not teach or suggest accessing the Internet via a mobile wireless network. Rather, the Gentry reference discloses a user accessing the Internet 46 via a personal computer 48 to configure the home location register 17 (Fig. 2 and col. 5, line 21 - 67). The Gentry reference does not teach or suggest using a mobile wireless network to access the Internet. The Gentry reference does not teach or suggest accessing the Internet using anything other than the personal computer 48, let alone using a mobile wireless network to access the Internet.

Moreover, even assuming arguendo that one of ordinary skill in the art would have

been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention.

The Gentry reference, like the Rasanen reference, does not teach or suggest does not teach or suggest the features of the present invention including changing from one connection between a portable terminal and one access point of a wireless communication gateway server to another connection between the portable terminal and another access point of the wireless communication gateway server. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Clearly, these novel features are not taught or suggested by the Gentry reference. The Gentry reference does not even disclose a wireless communication gateway server, let alone changing connections between access points on a wireless communication gateway server. Indeed, the Gentry reference is completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claim 22.

G. The Rasanen reference in view of the Valentine et al. reference

Regarding the rejection of claim 23, the Examiner alleges that the Valentine et al. reference would have been combined with the Rasanen reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and

problems.

Specifically, as explained above, the Rasanen reference is directed to addressing the problems of implementing hand-offs between base station cells when it is necessary to reduce the congestion of any base station cell (col. 3, line 56 - col. 4, line 10).

In contrast, as explained above, the Valentine et al. reference is directed to addressing the problem of inaccurate satellite hop delay for determining how to route a call from a satellite which receives a communication directly from a satellite phone (col. 2, line 42 - col. 3, line 30) by providing a satellite hop counter which includes three fields, one for each type of delay (col. 3, lines 32-43). Therefore, one of ordinary skill in the art at the time of the invention would not have been motivated to address the problems of implementing hand-offs between base station cells when it is necessary to reduce the congestion of any base station cell as disclosed by the Rasanen reference based upon the teachings of the Valentine et al. reference which is directed to the completely different problem of inaccurate satellite hop delay for determining how to route a call from a satellite which receives a communication directly from a satellite phone. Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

Rather, the Examiner merely alleges that it would have been obvious to modify the Rasanen reference based upon the teaching of the Valentine et al. reference "so that the satellite network can be used with the mobile wireless network. Applicant respectfully submits that the mere allegation that something can be used with something else does not

provide any motivation for making such a modification.

Moreover, even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention.

The Valentine et al. reference, like the Rasanen reference, does not teach or suggest does not teach or suggest the features of the present invention including changing from one connection between a portable terminal and one access point of a wireless communication gateway server to another connection between the portable terminal and another access point of the wireless communication gateway server. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Clearly, these novel features are not taught or suggested by the Valentine et al. reference. The Valentine et al. reference does not even disclose a wireless communication gateway server, let alone changing connections between access points on a wireless communication gateway server. Indeed, the Valentine et al. reference is completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claim 23.

H. The Kusaki et al. reference in view of the Rasanen reference

Regarding the rejection of claims 14 and 24, the Examiner alleges that the Rasanen reference would have been combined with the Kusaki et al. reference to form the claimed invention. Applicant submits, however, that these references would not have been combined

and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

Specifically, as explained above, the Kusaki et al. reference is directed to providing terminal information for each mobile station using either a home memory type mobile communication network which is limited by the size of a central database and a broadcast type mobile communication network which is limited by the amount of processing and increase in traffic required to transfer terminal information between switching centers.

In contrast, as explained above, the Rasanen reference is directed to addressing the problems of implementing hand-offs between base station cells when it is necessary to reduce the congestion of any base station cell. Therefore, one of ordinary skill in the art would not have been motivated to address the problem of providing terminal information for each mobile station as disclosed by the Kusaki et al. reference based upon the completely different problems of implementing hand-offs between base station cells as disclosed by the Rasanen reference. Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

Moreover, even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention. None of the applied references teach or suggest

transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained above, these features are important for reducing the amount of time required for a portable terminal to access an information server.

Rather, the Kusaki et al. reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. Rather, the Kusaki et al. reference, in a manner similar to that described in the background and shown in Fig. 1 of the present specification, Fig. 1 of the Kusaki et al. reference discloses a base station (base station BS) and a switching apparatus 22 (switching center 130).

Further, as explained above, contrary to the Examiner's allegations, the Rasanen reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained by the present specification, a wireless communication gateway server converts a protocol between the portable terminal and an information server on a network

In contrast, the Rasanen reference discloses addressing the problems of implementing handoffs between base station cells when it is necessary to reduce the congestion of any base station cell (col. 3, line 56 - col. 4, line 10). The Examiner appears to confuse a base station (BTS) as shown in Fig. 1 of the Rasanen reference with the wireless communication gateway servers used by the present invention.

Clearly, these novel features are not taught or suggested by the Rasanen reference and the Kusaki et al. reference. Indeed, the Rasanen reference and the Kusaki et al. reference are completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 14 and 24.

I. The Kusaki et al. reference in view of the Rasanen reference and the Hussain et al. reference

Regarding the rejection of claims 15-16 and 25-26, the Examiner alleges that the Rasanen reference would have been combined with the Kusaki et al. reference and that the Hussain et al. reference would have been combined with the combination of the Rasanen reference and the Kusaki et al. reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

As explained above, one of ordinary skill in the art would not have been motivated to combine the Rasanen reference and the Kusaki et al. reference because they are directed to completely different matters and problems.

In contrast to the Kusaki et al. reference and the Rasanen reference, as explained above, the Hussain et al. reference is directed to providing a system and method for providing preferential access to subscribers of localized service areas (LSA) that efficiently use the resources of the network, is compatible with the Support of Localized Service Area (SoLSA) standard and overcomes the problems presented by other prioritization techniques in the Global System for Mobile Communication (GSM) system. Therefore, one of ordinary skill in

the art would not have been motivated to address the problem of providing terminal information for each mobile station as disclosed by the Kusaki et al. reference or the problems of implementing hand-offs between base station cells when it is necessary to reduce the congestion of any base station cell as disclosed by the Rasanen reference with the Hussain et al. reference which is directed to the completely different problem of providing a system and method for providing preferential access to subscribers of localized service areas.

Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

Rather, the Examiner alleges that it would have been obvious to modify the teachings of the Rasanen reference and the Kusaki et al. reference with the disclosure of the Hussain et al. reference "in order to update position of the portable unit when handoff occurs." However, Applicant respectfully submits that the Hussain et al. does not teach anything at regarding any improvement to a system for updating the current location of a mobile unit. Indeed, the Hussain et al. reference does not teach or suggest anything at all about how to update the current location of the mobile unit.

Further, the Hussain et al. does not even teach or suggest anything at all about updating a position when a handoff occurs.

Moreover, even assuming arguendo that the Hussain et al. reference did teach a system for updating the current location of a mobile unit when a handoff occurs, the Hussain et al. reference does not provide any suggestion or motivation as to why such a system would be an improvement to the system for updating the current location of the mobile unit which

already exists within the system disclosed by the Rasanen reference and the Kusaki et al. reference.

In summary, there is no need to modify the systems disclosed by the Rasanen reference and the Kusaki et al. reference to provide a system for updating the current location of a mobile unit, because the system disclosed by the Rasanen reference and the system disclosed by the Kusaki et al. reference already have a system for updating the current location of a mobile unit.

Moreover, even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention. None of the applied references teach or suggest transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained above, these features are important for reducing the amount of time required for a portable terminal to access an information server.

Rather, as explained above, the Kusaki et al. reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. Rather, the Kusaki et al. reference, in a manner similar to that described in the background and shown in Fig. 1 of the present specification, Fig. 1 of the Kusaki et al. reference discloses a base station (base station BS) and a switching apparatus 22 (switching center 130).

Further, as explained above, contrary to the Examiner's allegations, the Rasanen reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained by the present specification, a wireless

communication gateway server converts a protocol between the portable terminal and an information server on a network

In contrast, the Rasanen reference discloses addressing the problems of implementing handoffs between base station cells when it is necessary to reduce the congestion of any base station cell (col. 3, line 56 - col. 4, line 10). The Examiner appears to confuse a base station (BTS) as shown in Fig. 1 of the Rasanen reference with the wireless communication gateway servers used by the present invention.

Additionally, the Hussain et al. reference does not remedy the deficiencies of the Kusaki et al. reference and the Rasanen reference because the Hussain et al. reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server.

Rather, in the same manner as described in the background and shown in Fig. 1 of the present specification, Fig. 1 of the Hussain et al. reference discloses a base station (Cell -B and/or base station controller BSC), a switching apparatus 22 (mobile switching center 12) and a position information database 23 (home location register 13).

The Examiner cites col. 3, lines 55-61 of the Hussain et al. reference in an attempt to support the allegation that the Hussain et al. reference discloses a wireless telephony server. However, the Examiner's citation merely describes how a base station controller BSC 11 recognizes the cell Cell B from which a call is made and determines which, if any, localized service area (LSA) contains the cell. The base station controller BSC 11 also obtains the mobile station's subscription information from the home location register HLR 13. The subscription information contains localized service area identification numbers for any

localized service area to which the mobile station subscribes. Nowhere within the Examiner's citation is there a teaching or suggestion of a wireless telephony server.

Rather, as explained above, the Examiner appears to confuse a wireless telephone server with a base station, base station controller, switching apparatus and a position information database.

Clearly, these novel features are not taught or suggested by the applied references. Indeed, the applied references are completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 15-16 and 25-26.

J. The Kusaki et al. reference in view of the Rasanen reference and the Gentry reference

Regarding the rejection of claim 17, the Examiner alleges that the Rasanen reference would have been combined with the Kusaki et al. reference and that the Gentry reference would have been combined with the combination of the Rasanen reference and the Kusaki et al. reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

As explained above, one of ordinary skill in the art would not have been motivated to combine the Rasanen reference and the Kusaki et al. reference because they are directed to

completely different matters and problems.

In contrast to the Kusaki et al. reference and the Rasanen reference, as explained above, the Gentry reference is directed to providing a method and system for provisioning (i.e. configuring the home location register to enable specified features) a home location register over the Internet. Therefore, one of ordinary skill in the art would not have been motivated to address the problem of providing terminal information for each mobile station as disclosed by the Kusaki et al. reference or the problems of implementing hand-offs between base station cells when it is necessary to reduce the congestion of any base station cell as disclosed by the Rasanen reference with the Gentry reference which is directed to the completely different problem of providing a method and system for provisioning (i.e. configuring the home location register to enable specified features) a home location register over the Internet.

Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

The Examiner alleges that it would have been obvious to modify the combination of the Rasanen reference and the Kusaki et al. reference based upon the disclosure of the Gentry reference "so that user (sic) can access internet (sic) via mobile wireless network."

Contrary to the Examiner's allegation, as explained above the Gentry reference does not teach or suggest accessing the Internet via a mobile wireless network. Rather, the Gentry reference discloses a user accessing the Internet 46 via a personal computer 48 to configure the home location register 17 (Fig. 2 and col. 5, line 21 - 67). The Gentry reference does not

teach or suggest using a mobile wireless network to access the Internet. The Gentry reference does not teach or suggest accessing the Internet using anything other than the personal computer 48, let alone using a mobile wireless network to access the Internet.

Moreover, even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention. None of the applied references teach or suggest transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained above, these features are important for reducing the amount of time required for a portable terminal to access an information server.

Rather, the Kusaki et al. reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. Rather, the Kusaki et al. reference, in a manner similar to that described in the background and shown in Fig. 1 of the present specification, Fig. 1 of the Kusaki et al. reference discloses a base station (base station BS) and a switching apparatus 22 (switching center 130).

Further, as explained above, contrary to the Examiner's allegations, the Rasanen reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained by the present specification, a wireless communication gateway server converts a protocol between the portable terminal and an information server on a network

In contrast, the Rasanen reference discloses addressing the problems of implementing handoffs between base station cells when it is necessary to reduce the congestion of any base

station cell (col. 3, line 56 - col. 4, line 10). The Examiner appears to confuse a base station (BTS) as shown in Fig. 1 of the Rasanen reference with the wireless communication gateway servers used by the present invention.

Moreover, the Gentry reference, like the Kusaki et al. reference and the Rasanen reference, does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained by the present specification, a wireless communication gateway server converts a protocol between the portable terminal and an information server on a network.

Further, the Gentry reference, like the Kusaki et al. reference and the Rasanen reference, does not teach or suggest a wireless telephony server. Rather, the Gentry reference discloses a personal computer 48 which may access a web server 44 via the Internet to request service features that the user would like to have activated. The web server 44 generates one or more home location register access messages which are transmitted via the Internet 46, the wireless data server 42 and the IS-41 Network 40 to the home location register 17 to activate the functions (col. 5, lines 43-67 and Fig. 2).

Moreover, the Gentry reference does not even teach or suggest a wireless communication gateway server, let alone a wireless communication gateway server which communicates via the Internet.

Clearly, these novel features are not taught or suggested by the applied references. Indeed, the applied references are completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claim 17.

K. The Kusaki et al. reference in view of the Rasanen reference and the Valentine et al. reference

Regarding the rejection of claim 18, the Examiner alleges that the Rasanen reference would have been combined with the Kusaki et al. reference and that the Valentine et al. reference would have been combined with the combination of the Rasanen reference and the Kusaki et al. reference to form the claimed invention. Applicant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Applicant submits that these references would not have been combined as alleged by the Examiner. Indeed, the references are directed to completely different matters and problems.

As explained above, one of ordinary skill in the art would not have been motivated to combine the Rasanen reference and the Kusaki et al. reference because they are directed to completely different matters and problems.

In contrast to the Kusaki et al. reference and the Rasanen reference, as explained above, the Valentine et al. reference is directed to addressing the problem of inaccurate satellite hop delay for determining how to route a call from a satellite which receives a communication directly from a satellite phone (col. 2, line 42 - col. 3, line 30) by providing a satellite hop counter which includes three fields, one for each type of delay (col. 3, lines 32-43). Therefore, one of ordinary skill in the art would not have been motivated to address the problem of providing terminal information for each mobile station as disclosed by the Kusaki et al. reference or the problems of implementing hand-offs between base station cells when it

is necessary to reduce the congestion of any base station cell as disclosed by the Rasanen reference with the Valentine et al. reference which is directed to the completely different problem of inaccurate satellite hop delay for determining how to route a call from a satellite which receives a communication directly from a satellite phone.

Thus, the references would not have been combined, absent hindsight.

Further, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, the Examiner does not even support the combination by identifying a reason for combining the references.

Rather, the Examiner merely alleges that it would have been obvious to modify the combination of the Rasanen reference and the Kusaki et al. reference based upon the teaching of the Valentine et al. reference "so that the satellite network can be used with the mobile wireless network. Applicant respectfully submits that the mere allegation that something can be used with something else does not provide any motivation for making such a modification.

Moreover, even assuming arguendo that one of ordinary skill in the art would have been motivated to combine these references, the combination would not teach or suggest each and every element of the claimed invention. None of the applied references teach or suggest transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained above, this feature is important for reducing the amount of time required for a portable terminal to access an information server.

Rather, the Kusaki et al. reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. Rather, the Kusaki et al. reference, in a manner similar to that described in the background and shown in Fig. 1 of the

present specification, Fig. 1 of the Kusaki et al. reference discloses a base station (base station BS) and a switching apparatus 22 (switching center 130).

Further, as explained above, contrary to the Examiner's allegations, the Rasanen reference does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained by the present specification, a wireless communication gateway server converts a protocol between the portable terminal and an information server on a network

In contrast, the Rasanen reference discloses addressing the problems of implementing handoffs between base station cells when it is necessary to reduce the congestion of any base station cell (col. 3, line 56 - col. 4, line 10). The Examiner appears to confuse a base station (BTS) as shown in Fig. 1 of the Rasanen reference with the wireless communication gateway servers used by the present invention.

Moreover, the Valentine et al. reference, like the Kusaki et al. reference and the Rasanen reference, does not teach or suggest a wireless communication gateway server, let alone transferring specification data from a first wireless communication gateway server to a second wireless communication gateway server. As explained by the present specification, a wireless communication gateway server converts a protocol between the portable terminal and an information server on a network.

Rather, in the same manner as described in the background and shown in Fig. 1 of the present specification, Figs. 1 and 2 of the Valentine et al. reference discloses a base station (base station system 25, base station controller 23 and satellite adapted base station system 220), a switching apparatus 22 (mobile switching center 14) and a position information

database 23 (home location register 26).

Additionally, contrary to the Examiner's allegation, the Valentine et al. reference does not teach or suggest a satellite network connected to wireless communication gateway servers, a switching apparatus or a wireless telephony server. Rather, the Valentine et al. reference merely discloses a mobile station 20 and a base station system 220 connected to a satellite network.

Clearly, these novel features are not taught or suggested by the applied references. Indeed, the applied references are completely unrelated to the claimed invention.

Therefore, the Examiner is respectfully requested to withdraw this rejection of claim 18.

III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully submits that claims 1-26, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the Application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: 8/28/03

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